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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

EMMA ADAMS,

Plaintiff,

vs.

AQUA 388 COMMUNITY
ASSOCIATION, ET AL.,

Defendants.

Case No.: 2:23-CV-02498-SB-JPR

**UNOPPOSED EX PARTE
APPLICATION TO SHORTEN
TIME TO HEAR THE MOTION
TO WITHDRAW AS COUNSEL OF
RECORD FOR PLAINTIFF**

Assigned to the Hon. Stanley
Blumenfeld, Jr., United States District
Judge

Complaint filed: April 3, 2023
Trial Date: December 16, 2024

Courtroom: 6C

EX PARTE APP TO SHORTEN TIME TO HEAR MTN TO WITHDRAW AS
COUNSEL - 1

EX PARTE APPLICATION

Plaintiff's counsel Russell Kornblith, Brent Hannafan, and Kevin Sharp, hereby make this unopposed *ex parte* application for an order shortening time on the motion to withdraw as counsel of record for Plaintiff, filed concurrently herewith. According to the Court's website, the next available hearing date is not until September 12, 2025, or later. Plaintiff's counsel seeks an order setting the motion for hearing at 8:30am on August 29, 2025, or as soon as the Court has availability.

Good cause exists for this application. This application is based on the attached Memorandum of Points and Authorities, the Declaration of Russell Kornblith filed concurrently herewith, all pleadings and records on file in this action, and on such further authority, evidence, or argument as may be presented at or before the time of any hearing on this application.

Defendant Aqua 388 Community Association and Aqua Maintenance Corporation are represented by Stephen Abraham, 1592 Pegasus St., Newport Beach, CA 92660; telephone: (949) 878-8608; email: stephen@abraham-lawoffices.com. Defendant Aqua Maintenance Corporation is additionally represented by Melissa T. Daugherty of the law firm O'Hagan Meyer, LLP, 550 S. Hope St., Ste. 2400, Los Angeles, CA 90071; telephone: (213) 647-0060; email: mdaugherty@ohaganmeyer.com. Defendants FirstService Residential California,

1 LLC and Rebecca Hawkins are represented by Roger B. Frederickson of the law
2 firm Gordon Rees Scully Mansukhani, LLP, 101 W. Broadway, Ste. 2000, San
3 Diego, CA 92101; telephone: (619) 230-7477; email: rfrederickson@grsm.com.
4 Defendant Christopher Harrington is represented by Brett G. Hampton of the law
5 firm Koletsky Mancini Feldman LLP, 3460 Wilshire Blvd., 8th Fl., Los Angeles,
6 CA 90010; telephone: (213) 427-2350; email: bhampton@kmfm.com.

7 On August 13, 2025, Plaintiff's counsel provided notice to Defendants of
8 their intent to file the instant Application. The parties met and conferred via
9 telephone on August 13, and on Microsoft Teams on August 14, 2025, and
10 Defendants indicated that they do not oppose the Application. Kornblith Decl. ¶ 3.

11
12 DATED: August 15, 2025

Respectfully submitted,

13 Sanford Heisler Sharp McKnight, LLP

14 By: /s/ Russell Kornblith

Russell Kornblith

15 Brent Hannafan*

Kevin Sharp*

16 *admitted *pro hac vice*

1 **I. INTRODUCTION**

2 Counsel for Plaintiff Dr. Emma Adams—Russell Kornblith, Kevin Sharp,
3 and Brent Hannafan—apply *ex parte* for an order shortening the time for a hearing
4 to be relieved as counsel. The next available hearing date for a regularly scheduled
5 motion does not appear to be until September 12, 2025—seven days after Plaintiff
6 is required to provide notice of whether she intends to accept the remittitur or
7 proceed to a new trial. *See* ECF No. 400 at 30. Counsel therefore make the instant
8 *ex parte* application to shorten time on the hearing of the withdrawal motion to
9 avoid or at least minimize any prejudice to Plaintiff that may arise from her having
10 to decide whether to accept the remittitur while the withdrawal motion remains
11 pending.

12 **II. FACTUAL AND PROCEDURAL BACKGROUND**

13 As more fully set forth in their motion to withdraw as counsel, Plaintiff’s
14 counsel seek leave of Court to withdraw as counsel in this matter under California
15 Rules of Professional Conduct 1.16(b)(1), 1.16(b)(4), and 1.16(b)(10) because of
16 the irreparable breakdown in the attorney-client relationship.

17 **III. ARGUMENT**

18 To justify *ex parte* relief, the moving party “must establish (1) ‘that [their]
19 cause will be irreparably prejudiced if the underlying motion is heard according to
20 regular noticed motion procedures’ and (2) that the crisis requiring *ex parte* relief

1 did not occur by any fault of their own (except excusable neglect).” *Welter v. Hurt*,
2 No. 2:23-cv-02627-SPG-MAR, 2024 WL 5317266, at *2 (C.D. Cal. Nov. 6, 2024)
3 (quoting *Mission Power Eng’g Co. v. Cont’l Cas. Co.*, 883 F. Supp. 488, 492 (C.D.
4 Cal. 1995)). *See also* Local Rule 37-3. Plaintiff’s counsel submits that the *Mission*
5 *Power* requirements have been met. *See* Russell Kornblith Declaration in Support
6 of Motion to Withdraw; Kevin Sharp Declaration in Support of Motion to
7 Withdraw; Brent Hannafan Declaration in Support of Motion to Withdraw. If the
8 Court requires additional information to evaluate the issues raised by counsel’s
9 motion, counsel requests leave of Court to file a declaration for *in camera* review.

10 IV. CONCLUSION

11 For the foregoing reasons, Plaintiff’s counsel respectfully requests that the
12 hearing on their withdrawal motion be set for as soon as possible.

13 DATED: August 15, 2025

Respectfully submitted,

14 Sanford Heisler Sharp McKnight, LLP

15 By: /s/ Russell Kornblith

Russell Kornblith

16 Brent Hannafan*

Kevin Sharp*

17 *admitted *pro hac vice*